

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**SCOTT TURNAGE , CORTEZ D. BROWN, §
DEONTAE TATE, JEREMY S. MELTON, AUBREY §
BROWN, ADMINISTRATOR AD LITEM FOR §
ESTATE OF ISSACCA POWELL, KEITH §
BURGESS, TRAVIS BOYD, TERRENCE DRAIN, §
and KIMBERLY ALLEN on behalf of themselves and §
all similarly situated persons, §**

Plaintiffs,

V.

BILL OLDHAM, in his individual capacity as former Sheriff of Shelby County, Tennessee; **FLOYD BONNER, JR.**, in his official capacity as Sheriff of Shelby County, Tennessee; **ROBERT MOORE**, in his individual capacity as former Jail Director of Shelby County, Tennessee; **KIRK FIELDS**, in his official capacity as Jail Director of Shelby County, Tennessee; **CHARLENE MCGHEE**, in her individual capacity as former Assistant Chief of Jail Security of Shelby County, Tennessee; **REGINALD HUBBARD**, in his official capacity as Assistant Chief of Jail Security of Shelby County, Tennessee; **DEBRA HAMMONS**, in her individual capacity as former Assistant Chief of Jail Programs of Shelby County, Tennessee; **TIFFANY WARD** in her official capacity as Assistant Chief of Jail Programs of Shelby County, Tennessee; **SHELBY COUNTY, TENNESSEE**, a Tennessee municipality; **TYLER TECHNOLOGIES, INC.**, a foreign corporation; **GLOBAL TEL*LINK CORPORATION**, a foreign corporation; **SOFTWARE AG USA, INC.**, a foreign corporation; **SIERRA-CEDAR, INC.**, a foreign corporation, **SIERRA SYSTEMS GROUP, INC.**, a foreign corporation; and **TETRUS CORP**, a foreign corporation

Defendants.

**JOINT STIPULATION REGARDING NUMBER OF DEPOSITIONS PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 30(a)(2)**

COME NOW Plaintiffs and all Defendants, (collectively, the “Parties”) and enter this stipulation pursuant to Federal Rule of Civil Procedure 30(a)(2) regarding the number of depositions to be taken by Plaintiffs in this matter.

1. This matter is a possible class action. The parties submitted an agreed Third Amended Scheduling Order (Doc. 326), which was entered by the Court on June 4, 2020 (Doc. 327). The Third Amended Scheduling Order provides for a bifurcation of class and merits discovery.

2. To date, in connection with class discovery, Plaintiffs have deposed the following seven (7) witnesses: Robert Moore, Jack Green, Debra Hammons, Shawna Webb, Keva Walton, Christine Floyd, and Paul Ziegler. Plaintiffs have requested the following additional five (5) depositions: Bill Oldham, Charlene McGhee, Honorable Judge Bill Anderson, Jr., Honorable Judge W. Mark Ward, and Honorable Judge Gerald Skahan. The parties have stipulated that Plaintiffs can exceed the 10-deposition limit in Federal Rule of Civil Procedure 30 in order to complete these specific additional five (5) depositions.

3. To date, Defendants have deposed the following seven (7) witnesses: Scott Turnage, Deontae Tate, Jeremy S. Melton, Aubrey Brown (Administrator Ad Litem for Estate of Issacca Powell), Keith Burgess, Terrance Drain, and Kimberly Allen. Defendants anticipate taking the deposition of Travis Boyd, and do not anticipate taking any other depositions at this time. The parties have stipulated that Defendants will not exceed the 10-deposition limit in Federal Rule of Civil Procedure 30.

4. This stipulation applies only to fact witnesses and to the class certification discovery stage of this matter. To the extent any party designates expert witnesses in the class certification stage of this case, the parties agree that those expert witness can be deposed. In addition, the parties reserve all rights regarding the number of appropriate depositions for the merits discovery stage

and the application of Rule 30(a)(2) to any future merits discovery.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully stipulate and agree as provided herein.

Dated: October 19, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on October 19, 2020, a true and correct copy of the foregoing document was forwarded by email to all counsel of record via CM/ECF or email.

/s/ Bradley E. Trammell